

ORIGINALCOURT OF COMMON PLEAS
CIVIL DIVISION
HAMILTON COUNTY, OHIO**A2003918**BRITTANY L. THOMPSON
3536 Zinsle Avenue
Cincinnati, Ohio 45213CASE NO. _____
JUDGE _____

Plaintiff,

vs.

**COMPLAINT FOR DAMAGES
WITH JURY DEMAND**C WILLIAM NONA
2161 West Horizon Drive
Hebron, Kentucky 41048**REGULAR MAIL WAIVER**

D130271705 INI

and

C UBER TECHNOLOGIES, INC.
c/o CT Corporation Systems
4400 Easton Commons Way, Suite 125
Columbus, Ohio 43219**REGULAR MAIL WAIVER**

and

C OHIO DEPARTMENT OF MEDICAID
c/o Joseph M. McCandish, Esq.
150 East Gay Street, 21st Floor
Columbus, Ohio 43215**REGULAR MAIL WAIVER****FILED**CLERK OF COURTS
HAMILTON COUNTY, OH
COMMON PLEAS
2020 NOV - 6 P 3:35

Defendants.

* * * * *

NOW COMES Plaintiff, Brittany Thompson (hereinafter "Plaintiff"), by and through the undersigned counsel, and for her Complaint against Defendants William Nona (hereinafter "Defendant Nona") and Uber Technologies, Inc. (hereinafter "Defendant Uber"), states as follows:

COUNT ONE

1. On or about November 9, 2018, at approximately 4:48 p.m., Plaintiff was lawfully riding as a passenger in a 2015 Hyundai Elantra not owned by her, which vehicle was lawfully traveling North on Reading Road, in the City of Cincinnati, Hamilton County, Ohio.
2. At this same date, time and place, Defendant William Nona (Kentucky Driver's License No. NO4164442), whose residence is believed to be located at 2161 West Horizon Drive, Hebron, Kentucky 41048, was operating a 2016 Toyota Camry (Kentucky License Plate No. 997VDF), traveling south on Reading Road, and made a left turn onto Eden Park Drive while not in the left turn lane, striking Plaintiff's vehicle on the front driver's side, and causing Plaintiff's vehicle to strike a third vehicle in the adjacent lane.
3. At this same date, time and place, and/or at such other date, time and place as may be proven at Trial, Defendant Nona, while operating said Toyota Camry, did negligently



and carelessly operate his vehicle, and, as a direct and proximate result of said wrongful act, the motor vehicle operated by Defendant Nona crashed into the vehicle in which Plaintiff was a passenger. Said negligence and carelessness included, but was not limited to, the following acts: Defendant Nona failed to stop before turning to allow Plaintiff's vehicle to clear the intersection; Defendant Nona failed to yield the right of way to vehicles lawfully entering the intersection and traveling North on Reading Road, including the vehicle in which Plaintiff was riding; Defendant Nona failed to use the correct lane to turn left and was cited by the responding officer for Improper Signal or Turn, a violation of Cincinnati Code Section 506-80; Defendant Nona failed to keep a proper lookout for Plaintiff and other persons similarly situated on the roadway; and Defendant Nona failed to maintain control of his vehicle so as to operate his vehicle with due care for the safety of Plaintiff and others upon the roadway.

4. Defendant Nona otherwise committed acts, which acts were negligent and in breach of a duty or duties owed to Plaintiff, and violated Ohio statutes, along with City of Cincinnati ordinances, violation of which requires assignment of negligence and liability and responsibility to Defendant Nona as a matter of law, any or all of which proximately caused the collision and injuries as set forth herein, and as a result of which Defendant Nona is liable for the damages and injuries suffered by Plaintiff as set out below.

5. As a direct and proximate result of the aforesaid wrongful conduct of Defendant, and the collision caused thereby, Plaintiff sustained bodily injuries, including, but not limited to, severe trauma to her left arm including a left humerus fracture, and right ankle swelling and pain, which injuries produced pain, suffering, and disability, and required Plaintiff to take time away from her employment, as well as to seek medical diagnosis and treatment, including, but not limited to, being transported by ambulance to University of Cincinnati Medical Center, where she was examined, admitted, and treated for her injuries, and for which she incurred medical expenses in excess of twenty-nine thousand dollars (\$29,000.00); and due to the permanent and progressive nature of said injuries, Plaintiff has and will in the future be required to seek additional medical diagnosis and treatment, and has had and will experience pain, suffering, loss of income, and disability, and has had and will in the future incur medical expenses, including additional surgery and physical therapy, all to the substantial damage of Plaintiff in an amount as will be proven at Trial.

6. As a direct and proximate result of the aforesaid wrongful conduct of Defendant, and the collision caused thereby, Plaintiff has experienced pain and suffering, and has been unable, and will in the future be unable, to enjoy her usual and customary activities, all to her loss in an amount to be proven at Trial.

COUNT TWO

7. Plaintiff reasserts and realleges paragraphs 1 through 6 above, as if fully rewritten herein.

8. At said time and place of the collision set forth above, Defendant Nona was in the employ of Defendant Uber Technologies, Inc. ("Defendant Uber"), or one of its subsidiaries, or a parent corporation and its subsidiaries, as an employee, independent contractor, agent, owner-operator, servant, and/or otherwise in a representative capacity, making Defendant Uber responsible for the injuries and damages caused to Plaintiff as a result of Defendant Nona's negligent and careless acts as aforesaid, under the legal theory of *respondeat superior* or otherwise.

9. As a direct and proximate result of the wrongful acts of Defendants, Plaintiff was injured as set out in Count One above, for which injury, loss and damage Defendants Nona and Uber are both jointly and severally liable.

COUNT THREE

10. Plaintiff reasserts and realleges paragraphs 1 through 9 above, as if fully rewritten herein.

11. At the same time and place of the above collision as aforesaid, Plaintiff was covered for her medical expenses under a policy of insurance issued to her by the Ohio Department of Medicaid/Caresource (hereinafter "Defendant Medicaid"), which did write a certain policy of group health insurance for the United States Secretary of Health and Human Services, under which policy of health insurance Plaintiff was insured for medical expenses which were incurred as a result of the above injuries (said policy of health insurance is in the possession of and under the control of Defendant Medicaid and, therefore, a copy is not available to Plaintiff for attachment hereto).

12. Defendant Medicaid has paid medical expenses incurred by Plaintiff and resulting from her injuries as aforesaid in an unknown amount as may be proven at Court and, therefore, has an interest relating to the subject matter of this action as a subrogee in said amount, and pursuant to the above contract of insurance.

WHEREFORE, Plaintiff Brittany L. Thompson prays for judgment against Defendants William Nona and Uber Technologies, Inc., both jointly and severally, in the amount in excess of twenty-five thousand dollars (\$25,000.00), representing fair and just compensation for her personal injury; compensatory and consequential damages; losses; pain and suffering; disability; out of pocket expenses; loss of time and income from employment; interest; and her costs herein, together with any and all other relief to which Plaintiff may be entitled, at law or in equity.

FURTHER, Plaintiff requests that the Court determine the rights and interests of Defendant Medicaid as arising out of the injuries herein, should the said Defendant assert claims based upon its rights of subrogation.

Respectfully submitted,



CHARLES H. BARTLETT, JR. (0017609)
Attorney for Plaintiff Brittany L. Thompson
917 Main Street, Suite 300
Cincinnati, Ohio 45202
(513) 977-4212 (513) 977-4218 Fax
lawyerchb@gmail.com

PRAECIPE

TO THE CLERK: Please serve the above Complaint upon Defendants by certified mail return receipt, first class waiver requested.

JURY DEMAND

Plaintiff demands a Trial by Jury of all issues.



COMMON PLEAS COURT
HAMILTON COUNTY, OHIO

Brittany Thompson

CASE NO. A 2 0 0 3 9 1 8

VS
William Nona, et al.

DOCUMENT TO BE SERVED & ITS FILED DATE
Complaint

PLAINTIFF/DEFENDANT REQUESTS:

- ☒ CERTIFIED MAIL SERVICE
☐ PERSONAL SERVICE
☐ PROCESS SERVICE
☐ REGISTERED INTERNATIONAL

- ☐ EXPRESS MAIL SERVICE
☐ REGULAR MAIL SERVICE
☐ RESIDENCE SERVICE
☐ FOREIGN SHERIFF

FILED

2020 NOV -6 P 3:35

CLERK OF COURTS
HAMILTON COUNTY, OH
COMMON PLEAS

ON:

1) William Nona
2161 W. Horizon Drive
Hebron, Kentucky 41048

3) Ohio Dept. of Medicaid
c/o Joseph McCandish, Esq.
150 East Gay Street, 21st Floor
Columbus, Ohio 43215

2) Uber Technologies, INC.
c/o CT Corporation Systems
4400 Easton Commons Way, suite 125
Columbus, Ohio 43219

4) _____

Charles H. Bartlett, Jr.
ATTORNEY
917 Main, ste 300, 45202
ADDRESS

513-977-4212
PHONE NUMBER
0017609
ATTORNEY NUMBER

**COURT OF COMMON PLEAS
HAMILTON COUNTY, OHIO**

REQUEST AND INSTRUCTIONS FOR ORDINARY MAIL SERVICE

Brittany Thompson

Plaintiff

-vs-

William Nona, et al.

Defendant

INSTRUCTIONS TO THE CLERK

A2003918

CASE NUMBER: _____

IF SERVICE OF PROCESS BY CERTIFIED MAIL IS RETURNED BY THE POSTAL AUTHORITIES WITH AN ENDORSEMENT OF "REFUSED" OR "UNCLAIMED" AND IF THE CERTIFICATE OF MAILING CAN BE DEEMED COMPLETE NOT LESS THAN FIVE (5) DAYS BEFORE ANY SCHEDULED HEARING, THE UNDERSIGNED WAIVES NOTICE OF THE FAILURE OF SERVICE BY THE CLERK AND REQUESTS ORDINARY MAIL SERVICE IN ACCORDANCE WITH CIVIL RULE 4.6 (C) OR (D) AND CIVIL RULE 4.6 (E).

Charles H. Bartlett, Jr.

ATTORNEY OF RECORD

(TYPE OR PRINT)

11/06/2020

DATE


ATTORNEY'S SIGNATURE

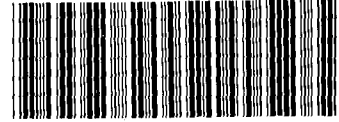
FILED

CLERK OF COURTS
HAMILTON COUNTY, OH
COMMON PLEAS
2020 NOV - 6 P 3:35



Aftab Pureval, Clerk of Courts
Court of Common Pleas, Hamilton County, Ohio
www.courtclerk.org

NOTIFICATION FORM



D130276873

CASE INFORMATION

Date: 11-14-2020

A 2 0 0 3 9 1 8

Case No.: _____

Caption: Brittany Thompson vs William Nona et al

ATTORNEY INFORMATION

Attorney Name: Charles H. Bartlett, JrAttorney Address: same

Firm

917 Main St. Suite 300

Street Number

Cincinnati, Oh 452

City, State, Zip

(513) 977-4212

Phone Number

977-4218

Fax Number

lawyerchb@gmail.com

E-Mail Address

Ohio Attorney Supreme Court No.: 0017609☐ Address Change Only☒ Request Case Notification / Not a Party Defendant

COURT PARTY INFORMATION

Name of Client: Brittany Thompson

Plaintiff



Defendant

Name of Client: _____



Plaintiff



Defendant

Name of Client: _____



Plaintiff



Defendant

Name of Client: _____



Plaintiff



Defendant

Name of Client: _____



Plaintiff



Defendant

Substituted for: _____ (if applicable)

COURT OF COMMON PLEAS
CIVIL DIVISION
HAMILTON COUNTY, OHIO

BRITTANY L. THOMPSON
3536 Zinsle Avenue
Cincinnati, Ohio 45213

CASE NO. A 2 0 0 3 9 1 8
JUDGE _____

Plaintiff,

vs.

AFFIDAVIT OF INDIGENCY

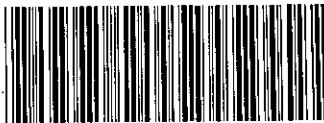
WILLIAM NONA, ET AL.
2161 West Horizon Drive
Hebron, Kentucky 41048

Defendants.

STATE OF OHIO

COUNTY OF HAMILTON

SS:



D130271714

FILED

CLERK OF COURTS
HAMILTON COUNTY, OH
COMMON PLEAS
2020 NOV -6 1 P 3:33

After being duly cautioned and sworn, I hereby state the following information is true to the best of my knowledge and belief. I understand I am subject to criminal charges for providing false information.

I. INCOME

Net Monthly Pay

- | | | |
|----|---|-------------------------|
| 1. | Employer: CVS Pharmacy | |
| | Position: pharmacy tech (part time) | <u>\$1,083-1,300.00</u> |
| | Spouse's Employer: <u>N/A</u> | <u>\$0.00</u> |
| 2. | Alimony/child support received | <u>\$0.00</u> |
| 3. | Public benefits received (ADC, SS, SSI, WC, etc.) | <u>**</u> |
| 4. | Other income (pension, interest, etc.) | <u>\$0.00</u> |
| | ** I receive Caresource and Ed Choice for my children | |

TOTAL MONTHLY INCOME \$1,083-1,300.00

II. ASSETS

- | | | |
|----|---|----------------------------------|
| 1. | Cash on hand \$0.00 | |
| | Cash in bank \$20.00 | |
| | Cash at home \$0.00 | TOTAL CASH <u>\$20.00</u> |
| 2. | Own house? Yes/ <u>No</u> How Long? _____ | Value <u>\$0.00</u> |
| 3. | Own motor home? Yes/ <u>No</u> | |
| | Make _____ Year _____ | Value <u>\$0.00</u> |
| 4. | Other property? <u>Yes</u> /No (Ford Freestyle) | Value <u>\$2,000.00</u> |

III. DEBTS/EXPENSES*

<u>Monthly living expenses</u>	<u>\$1,420.00</u>
_____	\$ _____
_____	\$ _____

*Monthly expenses average \$1,420.00 which consist of: utilities, water, telephone/cable, internet, gas, medical bills and prescription drugs, food, house maintenance, insurance, and property taxes.



IV. **FAMILY COMPOSITION**

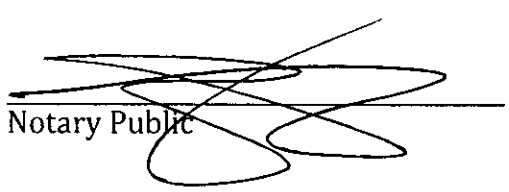
1. Number of persons you are required to support 7 plus myself
2. Ages of above 5,5,6,6,8,10,10
3. Their relationship to you (spouse, child, parent, etc.) children

I further state that to require me to pay the filing fee and the jury demand deposit at this time would present a financial hardship to me.

AFFIANT FURTHER SAYETH NAUGHT.


BRITTANY L. THOMPSON, Affiant

Sworn to before me, a Notary Public in and for said County and State, this 5th day of November, 2020.


Notary Public

Charles H. Bartlett, JR., Attorney at Law
NOTARY PUBLIC - STATE OF OHIO
My Commission has no expiration
date. Section 147.03 O.R.C.

COURT OF COMMON PLEAS
HAMILTON COUNTY, OHIO

BRITTANY L THOMPSON
PLAINTIFF

-- vs --

WILLIAM NONA
DEFENDANT

Use below number on
all future pleadings

No. A 2003918
SUMMONS

WILLIAM NONA
2161 WEST HORIZON DRIVE
HEBRON KY 41048

D - 1

You are notified
that you have been named Defendant(s) in a complaint filed by

BRITTANY L THOMPSON
3536 ZINSLE AVENUE
CINCINNATI OH 45213

Plaintiff(s)

in the Hamilton County, COMMON PLEAS CIVIL Division,
AFTAB PUREVAL, 1000 MAIN STREET ROOM 315,
CINCINNATI, OH 45202.

You are hereby summoned and required to serve upon the plaintiff's attorney, or upon the plaintiff, if he/she has no attorney of record, a copy of an answer to the complaint within twenty-eight (28) days after service of this summons on you, exclusive of the day of service. Your answer must be filed with the Court within three (3) days after the service of a copy of the answer on the plaintiff's attorney.

Further, pursuant to Local Rule 10 of Hamilton County, you are also required to file a Notification Form to receive notice of all future hearings.

If you fail to appear and defend, judgement by default will be rendered against you for the relief demanded in the attached complaint.

Name and Address of attorney
CHARLES H BARTLETT JR
917 MAIN STREET
SUITE 300
CINCINNATI OH 45202

AFTAB PUREVAL
Clerk, Court of Common Pleas
Hamilton County, Ohio

By RICK HOFMANN Deputy

Date: November 10, 2020



D130279194



VERIFY RECORD

COURT OF COMMON PLEAS
HAMILTON COUNTY, OHIO

BRITTANY L THOMPSON
PLAINTIFF

-- vs --

WILLIAM NONA
DEFENDANT

Use below number on
all future pleadings

No. A 2003918
SUMMONS

UBER TECHNOLOGIES INC
CT CORPORATION SYSTEM
4400 EASTON COMMONS WAY STE 125
COLUMBUS OH 43219

D - 2

You are notified
that you have been named Defendant(s) in a complaint filed by

BRITTANY L THOMPSON
3536 ZINSLE AVENUE
CINCINNATI OH 45213

Plaintiff(s)

in the Hamilton County, COMMON PLEAS CIVIL Division,
AFTAB PUREVAL, 1000 MAIN STREET ROOM 315,
CINCINNATI, OH 45202.

You are hereby summoned and required to serve upon the plaintiff's attorney, or upon the plaintiff, if he/she has no attorney of record, a copy of an answer to the complaint within twenty-eight (28) days after service of this summons on you, exclusive of the day of service. Your answer must be filed with the Court within three (3) days after the service of a copy of the answer on the plaintiff's attorney.

Further, pursuant to Local Rule 10 of Hamilton County, you are also required to file a Notification Form to receive notice of all future hearings.

If you fail to appear and defend, judgement by default will be rendered against you for the relief demanded in the attached complaint.

Name and Address of attorney
CHARLES H BARTLETT JR
917 MAIN STREET
SUITE 300
CINCINNATI OH 45202

AFTAB PUREVAL
Clerk, Court of Common Pleas
Hamilton County, Ohio

By RICK HOFMANN Deputy

Date: November 10, 2020



D130279210



VERIFY RECORD

COURT OF COMMON PLEAS
HAMILTON COUNTY, OHIO

BRITTANY L THOMPSON
PLAINTIFF

-- vs --

WILLIAM NONA
DEFENDANT

Use below number on
all future pleadings

No. A 2003918
SUMMONS

OHIO DEPARTMENT OF MEDICAID
CO JOSEPH M MCCANDISH ESQ
150 EAST GAY STREET 21ST FLOOR
COLUMBUS OH 43215

D - 3

You are notified
that you have been named Defendant(s) in a complaint filed by

BRITTANY L THOMPSON
3536 ZINSLE AVENUE
CINCINNATI OH 45213

Plaintiff(s)

in the Hamilton County, COMMON PLEAS CIVIL Division,
AFTAB PUREVAL, 1000 MAIN STREET ROOM 315,
CINCINNATI, OH 45202.

You are hereby summoned and required to serve upon the plaintiff's attorney, or upon the plaintiff, if he/she has no attorney of record, a copy of an answer to the complaint within twenty-eight (28) days after service of this summons on you, exclusive of the day of service. Your answer must be filed with the Court within three (3) days after the service of a copy of the answer on the plaintiff's attorney.

Further, pursuant to Local Rule 10 of Hamilton County, you are also required to file a Notification Form to receive notice of all future hearings.

If you fail to appear and defend, judgement by default will be rendered against you for the relief demanded in the attached complaint.

Name and Address of attorney
CHARLES H BARTLETT JR
917 MAIN STREET
SUITE 300
CINCINNATI OH 45202

AFTAB PUREVAL
Clerk, Court of Common Pleas
Hamilton County, Ohio

By RICK HOFMANN Deputy

Date: November 10, 2020



D130279247



VERIFY RECORD



Date Produced: 11/16/2020

HAMILTON COUNTY CLERK OF COURTS:

The following is the delivery information for Certified Mail™ item number 7194 5168 6310 0929 6207. Our records indicate that this item was delivered on 11/14/2020 at 12:00 p.m. in HEBRON, KY 41048. The scanned image of the recipient information is provided below.

Signature of Recipient :

William Nona

Address of Recipient :

2161 W. Horizon

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

Sincerely,
United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

Customer Reference Number: 15921073SEQ1



FILED 12/16/2020 6:54:10
 SUMMONS & COMPLAINT
 A 2003918 D2
 UBER TECHNOLOGIES INC
 FILED: 11/16/2020 6:54:10

Date Produced: 11/16/2020

HAMILTON COUNTY CLERK OF COURTS:

The following is the delivery information for Certified Mail™ item number 7194 5168 6310 0929 6214. Our records indicate that this item was delivered on 11/13/2020 at 11:46 a.m. in COLUMBUS, OH 43224. The scanned image of the recipient information is provided below.

Signature of Recipient :

Daniel D. Keagy

Address of Recipient :

Qty 4400 Easton Ste 125
Des Comm.

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

Sincerely,
United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

Customer Reference Number: 15921075SEQ1

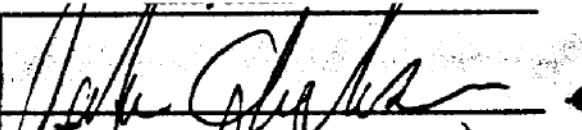


Date Produced: 11/23/2020

HAMILTON COUNTY CLERK OF COURTS:

The following is the delivery information for Certified Mail™ item number 7194 5168 6310 0929 6221. Our records indicate that this item was delivered on 11/16/2020 at 07:23 a.m. in COLUMBUS, OH 43216. The scanned image of the recipient information is provided below.

Signature of Recipient :

Signature X	
Printed Name	JOHN A. HENSON

Address of Recipient :

Delivery Address	Atty General
------------------	--------------

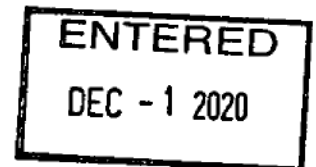
Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

Sincerely,
United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

Customer Reference Number: 15921077SEQ1

COURT OF COMMON PLEAS
HAMILTON COUNTY, OHIO



BRITTANY THOMPSON, : Case No. A2003918

Plaintiff, : Judge Cooper

v. :

WILLIAM NONA, : ENTRY GRANTING LEAVE TO
 : PROCEED IN FORMA PAUPERIS

Defendant. :

Upon consideration of the motion and affidavit of BRITTANY THOMPSON and following a hearing, pursuant to R.C. 2323.311 the court finds that the movant is unable to make advance deposits for fees and costs. The motion is therefore granted and the requirement that said movant make advance deposit in this action is hereby waived.


MARGARET B. RENTZ,
MAGISTRATE
COURT OF COMMON PLEAS



VERIFY RECORD

COURT OF COMMON PLEAS
CIVIL DIVISION
HAMILTON COUNTY, OHIO

BRITTANY L. THOMPSON
3536 Zinsle Avenue
Cincinnati, Ohio 45213

CASE NO. A 2 0 0 3 9 1 8
JUDGE _____

Plaintiff,

vs.

AFFIDAVIT OF INDIGENCY

WILLIAM NONA, ET AL.
2161 West Horizon Drive
Hebron, Kentucky 41048

Defendants.

STATE OF OHIO

COUNTY OF HAMILTON

SS:



D130271714

FILED

2020 NOV -6 1 P 3:38

CLERK OF COURTS
HAMILTON COUNTY, OH
COMMON PLEAS

After being duly cautioned and sworn, I hereby state the following information is true to the best of my knowledge and belief. I understand I am subject to criminal charges for providing false information.

I. INCOME

Net Monthly Pay

- | | |
|---|-------------------------|
| 1. Employer: CVS Pharmacy | |
| Position: pharmacy tech (part time) | <u>\$1,083-1,300.00</u> |
| Spouse's Employer: <u>N/A</u> | <u>\$0.00</u> |
| 2. Alimony/child support received | <u>\$0.00</u> |
| 3. Public benefits received (ADC, SS, SSI, WC, etc.) | <u>**</u> |
| 4. Other income (pension, interest, etc.) | <u>\$0.00</u> |
| ** I receive Caresource and Ed Choice for my children | |

TOTAL MONTHLY INCOME \$1,083-1,300.00

II. ASSETS

- | | | |
|--|---------|----------------------------------|
| 1. Cash on hand | \$0.00 | |
| Cash in bank | \$20.00 | |
| Cash at home | \$0.00 | |
| | | TOTAL CASH <u>\$20.00</u> |
| 2. Own house? Yes/ <u>No</u> How Long? _____ | | Value <u>\$0.00</u> |
| 3. Own motor home? Yes/ <u>No</u> | | |
| Make _____ Year _____ | | Value <u>\$0.00</u> |
| 4. Other property? <u>Yes</u> /No (Ford Freestyle) | | Value <u>\$2,000.00</u> |

III. DEBTS/EXPENSES*

<u>Monthly living expenses</u>	<u>\$1,420.00</u>
_____	\$ _____
_____	\$ _____

*Monthly expenses average \$1,420.00 which consist of: utilities, water, telephone/cable, internet, gas, medical bills and prescription drugs, food, house maintenance, insurance, and property taxes.

IV. **FAMILY COMPOSITION**

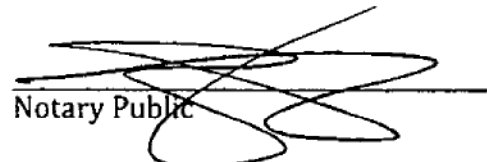
1. Number of persons you are required to support 7 plus myself
2. Ages of above 5,5,6,6,8,10,10
3. Their relationship to you (spouse, child, parent, etc.) children

I further state that to require me to pay the filing fee and the jury demand deposit at this time would present a financial hardship to me.

AFFIANT FURTHER SAYETH NAUGHT.


BRITTANY L. THOMPSON, Affiant

Sworn to before me, a Notary Public in and for said County and State, this 5th day of November, 2020.


Notary Public

Charles H. Bartlett, JR., Attorney at Law
NOTARY PUBLIC - STATE OF OHIO
My Commission has no expiration
date. Section 147.03 O.R.C.



Aftab Pureval, Clerk of Courts
Court of Common Pleas, Hamilton County, Ohio
www.courtclerk.org

NOTIFICATION FORM

CASE INFORMATION

Date: 12/8/20

Case No.: A2003918

Caption: Brittany L. Thompson vs William Nona, et al.

ATTORNEY INFORMATION

Attorney Name: Andrew H. Isakoff

Attorney Address: Marshall Dennehey Warner Coleman & Goggin

Firm

127 Public Square, Suite 3510

Street Number

Cleveland, Ohio 44114

City, State, Zip

216-912-3800

Phone Number

216-344-9006

Fax Number

ahisakoff@mdwgcg.com

E-Mail Address

Ohio Attorney Supreme Court No.: 0037177

☐ Address Change Only

☐ Request Case Notification / Not a Party Defendant

COURT PARTY INFORMATION

Name of Client: William Nona

☐ Plaintiff ☒ Defendant

Name of Client:

☐ Plaintiff ☐ Defendant

Name of Client:

☐ Plaintiff ☐ Defendant

Name of Client:

☐ Plaintiff ☐ Defendant

Name of Client:

☐ Plaintiff ☐ Defendant

Substituted for: (if applicable)

IN THE COURT OF COMMON PLEAS
HAMILTON COUNTY, OHIO

BRITTANY L. THOMPSON,

Plaintiff,

-VS-

WILLIAM NONA, *et al.*,

Defendants.

CASE NO. A2003918

JUDGE ETHNA M. COOPER

ANSWER OF DEFENDANT WILLIAM
NONA TO PLAINTIFF'S COMPLAINT

(Jury Demand Endorsed Hereon)

Now comes Defendant William Nona by and through the undersigned counsel, and for his Answer to Plaintiff's Complaint states as follows:

1. In response to the allegations set forth in Paragraph 1 of Plaintiff's Complaint, Defendant William Nona admits that he was involved in a motor vehicle collision that occurred on the date and at the time and location as described by Plaintiff and, upon information and belief, further admits that Plaintiff was a passenger in the 2015 Hyundai Elantra, one of the vehicles involved in that accident. In further responding to said allegations, Defendant Nona denies the same either for want of knowledge and/or for the truthfulness thereof.

2. In response to the allegations set forth in Paragraph 2 of Plaintiff's Complaint, Defendant William Nona admits that he was a fully licensed driver in the State of Kentucky and further, at all times pertinent he resided at the address specified therein and, further, that he was operating a 2016 Toyota Camry with the license plate as alleged and, further, that he was traveling in a generally southbound direction on Redding Road. Defendant William Nona denies the remaining allegations as set forth in Paragraph 2 of Plaintiff's Complaint.



3. Defendant William Nona denies the allegations set forth in Paragraph 3 of Plaintiff's Complaint.

4. Defendant William Nona denies the allegations set forth in Paragraph 4 of Plaintiff's Complaint.

5. Defendant William Nona denies the allegations set forth in Paragraph 5 of Plaintiff's Complaint.

6. Defendant William Nona denies the allegations set forth in Paragraph 6 of Plaintiff's Complaint.

7. In response to Paragraph 7 of Plaintiff's Complaint, Defendant William Nona incorporates by reference as fully rewritten herein his foregoing answer to Paragraphs 1 through 6 of Plaintiff's Complaint.

8. In so far as the allegations set forth in Paragraph 8 apply to this answering Defendant, Defendant Nona denies that he was employed by Defendant Uber Technologies, Inc., but rather was at all times pertinent an independent contractor. Defendant William Nona denies the remaining allegations set forth in Paragraph 8 of Plaintiff's Complaint.

9. Defendant William Nona denies the allegations set forth in Paragraph 9 of Plaintiff's Complaint.

10. In response to the allegations set forth in Paragraph 10 of Plaintiff's Complaint, Defendant Nona incorporates by reference as if fully rewritten herein his foregoing answer to Paragraphs 1 through 9 of Plaintiff's Complaint.

11. Defendant William Nona is without knowledge sufficient to form a belief as to the truth of the allegations set forth in Paragraph 11 of Plaintiff's Complaint and therefore denies the same.

12. Defendant William Nona is without knowledge sufficient to form a belief as to the truth of the allegations set forth in Paragraph 12 of Plaintiff's Complaint and therefore denies the same.

AFFIRMATIVE DEFENSES

1. Defendant William Nona denies each and every remaining allegation set forth in Plaintiff's Complaint not heretofore specifically accepted.

2. Defendant William Nona states that Plaintiff's Complaint fails to state a cause of action upon against him upon which relief can be granted.

3. Defendant William Nona states that the Plaintiff has failed to name a necessary and indispensable party to the within litigation pursuant to the requirements of Civil Rules 19 and 19.1 of the Ohio Rules of Civil Procedure.

4. Defendant William Nona states that the Plaintiff failed to mitigate damages.

5. Defendant William Nona deserves the right to amend this answer to include defenses not currently known, but which may be learned through the course of future discovery.

WHEREFORE, having fully answered the allegations set forth in Plaintiff's Complaint, Defendant William Nona prays that said Complaint be dismissed, with prejudice, at costs to Plaintiff, plus such further and additional relief as this court deems just and proper including costs and attorney fees.

Respectfully submitted,
MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN

By: /s/Andrew H. Isakoff
ANDREW H. ISAKOFF (0037177)
127 Public Square, Suite 3510
Cleveland, Ohio 44114
Phone: (216) 912-3800 /Fax: (216) 344-9006
Email: ahisakoff@mdwecg.com
Counsel for Defendant, William Nona

JURY DEMAND

Pursuant to Civil Rule 38, a trial by jury composed of the maximum number of jurors by law is hereby demanded on all issues.

/s/Andrew H. Isakoff
ANDREW H. ISAKOFF (0037117)
Counsel for Defendant, William Nona

CERTIFICATE OF SERVICE

I hereby certify that on December 8, 2020, a copy of the foregoing was filed electronically with the Hamilton County Clerk of Courts. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Unrepresented parties will be notified by U.S. regular mail.

Uber Technologies, Inc.
CT Corporation System
4400 Easton Commons Way, Suite 125
Columbus, Ohio 43219
Defendant

Ohio Department of Medicaid
c/o Joseph M. McCandish, Esq.
150 East Gay Street, 21st Floor
Columbus, Ohio 43215
Defendant

MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN

By: /s/Andrew H. Isakoff
ANDREW H. ISAKOFF (0037177)
Counsel for Defendant, William Nona



Aftab Pureval, Clerk of Courts
Court of Common Pleas, Hamilton County, Ohio
www.courtclerk.org

NOTIFICATION FORM

CASE INFORMATION

Date: December 14, 2020

Case No.: A 2003918

Caption: Brittany L. Thompson vs William Nona, et al.

ATTORNEY INFORMATION

Attorney Name: Jason H. Beehler

Attorney Address: Kegler, Brown, Hill + Ritter
Firm
65 East State Street, Suite 1800
Street Number
Columbus, OH 43215
City, State, Zip
614-462-5400
Phone Number
614-464-2634
Fax Number
jbeehler@keglerbrown.com
E-Mail Address

Ohio Attorney Supreme Court No.: 0085337

☐ **Address Change Only**

☐ **Request Case Notification / Not a Party Defendant**

COURT PARTY INFORMATION

Name of Client: Uber Technologies, Inc.

☐ **Plaintiff** ☒ **Defendant**

Name of Client: _____

☐ **Plaintiff** ☐ **Defendant**

Name of Client: _____

☐ **Plaintiff** ☐ **Defendant**

Name of Client: _____

☐ **Plaintiff** ☐ **Defendant**

Name of Client: _____

☐ **Plaintiff** ☐ **Defendant**

Substituted for: _____ **(if applicable)**

IN THE COURT OF COMMON PLEAS
HAMILTON COUNTY, OHIO

BRITTANY L. THOMPSON,

Plaintiff,

v.

WILLIAM NONA, *et al.*,

Defendants,

Case No.: A 2003918

**STIPULATION GRANTING EXTENSION OF TIME
TO MOVE OR PLEAD**

Pursuant to Loc. R. 12 and upon agreement of the parties, Defendant Uber Technologies, Inc. shall have a fourteen (14) day extension of time, until December 25, 2020, within which to answer or otherwise plead in response to Plaintiff's Complaint. No prior extension of time in which to answer, plead, or otherwise move has been granted to said Defendant. This stipulated extension does not exceed twenty-eight (28) days and is being filed prior to the expiration of the initial response date.

/s/ Charles H. Bartlett, Jr.

Charles H. Bartlett, Jr. (0017609)
917 Main Street
Suite 300
Cincinnati, OH 45202
Tel: 513-977-4212
Fax: 513-977-4218
lawyerchb@gmail.com

Counsel for Plaintiff

/s/ Jason H. Beehler

Jason H. Beehler (0085337)
Jane K. Gleaves (0095942)
Kegler, Brown, Hill & Ritter, LPA
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jbeehler@keglerbrown.com
jgleaves@keglerbrown.com

*Attorneys for Defendant Uber Technologies,
Inc.,*



VERIFY RECORD

000001\004010\4813-1396-5780v1

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was filed and served via the Court's Electronic Filing System on December 14, 2020 upon the following parties:

Charles H. Bartlett, Jr. (0017609)
917 Main Street
Suite 300
Cincinnati, OH 45202
Tel: 513-977-4212
Fax: 513-977-4218
lawyerchb@gmail.com

Counsel for Plaintiff

/s/ Jason H. Beehler

Jason H. Beehler (0085337)

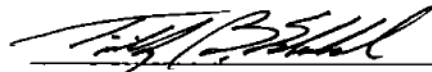
Timothy B. Schenkel (0061110)
Attorney for Defendant,
William Nona

COURT OF COMMON PLEAS
HAMILTON COUNTY, OHIO

BRITTANY L. THOMPSON	:	CASE NO. A2003918
	:	
Plaintiff,	:	JUDGE ETHNA M. COOPER
vs.	:	
	:	<u>NOTICE OF APPEARANCE</u>
WILLIAM NONA, et al.,	:	
	:	
Defendants.	:	
	:	

Comes now the Defendant, William Nona, by and through counsel, and hereby notifies all parties that Timothy B. Schenkel of Marshall Dennehey will serve as co-counsel for the Defendant, William Nona, along with Andy H. Isakoff of Marshall Dennehey in the above-styled action.

Respectfully submitted,



Timothy B. Schenkel (0061110)
Andy H. Isakoff (0037177)
MARSHALL DENNEHEY WARNER
COLEMAN & GOGGIN
312 Elm Street, Suite 1850
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tbschenkel@mdwccg.com
Attorneys for Defendant,
William Nona



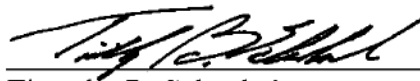
CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing Notice of Appearance was served via ordinary U.S. mail, postage prepaid, this 14th day of December, 2020, upon the following parties:

Charles H. Bartlett, Jr.
917 Main Street, Suite 300
Cincinnati, OH 45202
Attorney for Plaintiff,
Brittany L. Thompson

Jason H. Beehler
Jane K. Gleaves
KEGLER, BROWN, HILL & RITTER, LPA
65 East State Street, Suite 1800
Columbus, OH 43215
Attorneys for Defendant,
Uber Technologies, Inc.

Ohio Department of Medicaid
c/o Joseph M. McCandish
150 East Gay Street, 21st Floor
Columbus, OH 43215
Defendant



Timothy B. Schenkel



Aftab Pureval, Clerk of Courts
Court of Common Pleas, Hamilton County, Ohio
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NOTIFICATION FORM

CASE INFORMATION

Date: December 14, 2020

Case No.: A 2003918

Caption: Brittany L. Thompson vs William Nona, et al.

ATTORNEY INFORMATION

Attorney Name: Timothy B. Schenkel

Attorney Address: Marshall Dennehey Warner Coleman & Goggin

Firm

312 Elm Street, Suite 1850

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(513) 372-6812

Phone Number

(513) 372-6801

Fax Number

tbschenkel@mdwccg.com

E-Mail Address

Ohio Attorney Supreme Court No.: 0061110

☐ **Address Change Only**

☐ **Request Case Notification / Not a Party Defendant**

COURT PARTY INFORMATION

Name of Client: William Nona

☐ **Plaintiff** ☒ **Defendant**

Name of Client: _____

☐ **Plaintiff** ☐ **Defendant**

Name of Client: _____

☐ **Plaintiff** ☐ **Defendant**

Name of Client: _____

☐ **Plaintiff** ☐ **Defendant**

Name of Client: _____

☐ **Plaintiff** ☐ **Defendant**

Substituted for: _____ **(if applicable)**